

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Bankruptcy No. 14-22325 JAD
Andrea N. Bullock,	:	
Debtor,	:	
	:	Chapter 13
Deutsche Bank National Trust Company,	:	
Movant,	:	Doc. No.
	:	
v.	:	Related to Doc. No. 121
Andrea N. Bullock, and	:	
Ronda J. Winnecour, Chapter 13 Trustee,	:	Response due: 08/12/16
Respondents.	:	

**DECLARATION THAT CHAPTER 13 PLAN IS SUFFICIENT**  
**WITH THE PAYMENT CHANGE**

And now comes the Debtor, by and through her attorney, Francis E. Corbett, and respectfully represents as follows:

1. The Notice of Payment Change describes a small payment increase from \$650.63 to \$659.69.
2. The plan is adequately funded to cover this increase.
3. The payment of \$659.69 should be incorporated into the plan as of September 1, 2016.

Respectfully Submitted,

**Date: 07/26/16**

s/ Francis E. Corbett  
**Francis E. Corbett, Esquire PA I.D. #37594**  
**[fcorbett@fcorbettlaw.com](mailto:fcorbett@fcorbettlaw.com)**  
**310 Grant Street, Suite 1420**  
**Pittsburgh, PA 15219-2230**  
**(412) 456-1882**

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**CERTIFICATE OF SERVICE OF DECLARATION THAT THE  
CHAPTER 13 PLAN IS SUFFICIENT  
WITH THE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties on the attached list via NECF on July 26, 2016.

Ronda J. Winnecour, Chapter 13 Trustee at [cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)  
Office of the U.S. Trustee at [ustpreion03.pi.ecf@usdoj.gov](mailto:ustpreion03.pi.ecf@usdoj.gov)  
Andrew F. Gornall, Esquire [agornall@goldbecklaw.com](mailto:agornall@goldbecklaw.com)

The type of service made on the debtor and the party listed below was First Class Mail.

JP Morgan Chase Bank, N.A.  
Attn: Rochelle Johnson  
700 Kansas Lane  
Monroe, LA 71203

EXECUTED ON: 07/26/16

s/Francis E. Corbett  
**Francis E. Corbett, Esquire, PA I.D. #37594**  
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